

RIKER, DANZIG, SCHERER,  
HYLAND & PERRETTI LLP  
Dennis J. O'Grady, Esq. (DO 7430)  
J. Alex Kress, Esq. (JK 7189)  
Mark E. Hall, Esq. (MH 9621)  
Headquarters Plaza  
One Speedwell Avenue  
Morristown, New Jersey 07962  
(973) 538-0800

WEIL, GOTSHAL & MANGES LLP  
Martin J. Bienenstock, Esq. (MJB NY-3001)  
767 Fifth Avenue  
New York, New York 10153  
(212) 310-8000

Co-Attorneys for the Debtors

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:

G-I HOLDINGS INC., et al.,

Debtors.

In Proceedings for Reorganization under Chapter 11

Case Nos. 01-30135 (RG) and 01-38790 (RG) (Jointly  
Administered)

Hon. Rosemary Gambardella, U.S.B.J.

**NOTICE OF MOTION OF G-I HOLDINGS INC. FOR  
AN ORDER PURSUANT TO BANKRUPTCY RULE  
9019(A) APPROVING SETTLEMENT WITH  
KWELM AND THE BERMUDA FIRE & MARINE  
INSURANCE COMPANY LIMITED IN  
LIQUIDATION**

**Hearing Date: September 26, 2006  
at 11:00 a.m.**

**Oral Argument: Requested**

TO: THE HONORABLE ROSEMARY GAMBARDELLA,  
UNITED STATES BANKRUPTCY JUDGE

CREDITORS REQUESTING NOTICE AND OTHER PARTIES-IN-INTEREST

**PLEASE TAKE NOTICE** that on the **26th day of September 2006, at 11:00**

**a.m.**, the undersigned Weil Gotshal & Manges LLP and Riker Danzig Scherer Hyland & Perretti

LLP, co-counsel for the Debtors, shall move before The Honorable Rosemary Gambardella, U.S.B.J. at the United States Bankruptcy Court, Martin Luther King Jr. Federal Building and Courthouse, 50 Walnut Street, Courtroom 3E, Newark, New Jersey 07102 seeking the entry of an Order Pursuant to Bankruptcy Rule 9019(A) Approving Settlement with KWELM and the Bermuda Fire & Marine Insurance Company Limited in Liquidation (the "Motion").

**PLEASE TAKE FURTHER NOTICE** that in support of the Motion, the Debtors shall rely upon the Application and Affidavit of Anthony Bartell filed herewith. A proposed form of order is also submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that no brief is necessary as there are no contested issues of law or fact and the legal basis for the request made is sufficiently set forth in the Application.

**PLEASE TAKE FURTHER NOTICE** that pursuant to D.N.J. LBR 9013-1(d), objections, if any, to the Application shall be filed with the Clerk of the Bankruptcy Court and shall be served upon the undersigned at least seven (7) days prior to the return date set forth above, and in the absence of the filing of any objections, the relief requested by the Debtors may be granted.

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**PLEASE TAKE FURTHER NOTICE** that pursuant to D.N.J. LBR 9013-1(f),  
the Debtors hereby request oral argument on the Motion.

Respectfully submitted,

RIKER, DANZIG, SCHERER, HYLAND  
& PERRETTI LLP

Dated: September 6, 2006  
Morristown, New Jersey

By: /s/ Dennis J. O'Grady  
Dennis J. O'Grady (DO 7430)  
J. Alex Kress (JK 7189)

-and-

WEIL, GOTSHAL & MANGES LLP  
Martin J. Bienenstock (MJB NY-3001)

Co- Attorneys for the Debtors

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